IN THE UNITED STATES BANKRUPTCY COURT FOR THE MIDDLE DISTRICT OF TENNESSEE NASHVILLE DIVISION

IN RE:)	
)	
SABRE DEFENCE INDUSTRIES LLC,)	BK NO 11-01431-KL3-11
)	
DEBTOR IN POSSESSION)	

<u>APPLICATION FOR ORDER APPROVING APPOINTMENT OF CHAPTER 11 TRUSTEE</u>

The United States Trustee hereby applies to the court pursuant to FRBP 2007.1

(c) for approval of the appointment of Michael E. Collins as Chapter 11 Trustee in the above referenced case and in support thereof, states:

- The United States Trustee has appointed Michael E. Collins as Chapter
 Trustee in the above-referenced case subject to his submission,
 within 10 days of his appointment, all requested background
 information necessary for the investigation fo him on behalf of the
 United States Justice Department.
- 2. The United States Trustee has consulted with the following individuals concerning the appointment of a trustee: Elliott Warner Jones, Sr., attorney for the Debtor in Possession; Robert Welhoelter, Attorney for Worldwide Technologies, Whitworth Tool, Inc.; Gary Chaffin, attorney for Tennessee Commerce Bank; Paul G. Jennings, attorney for Estate of Howard H. Hoffman; Ernest B. Williams, IV, attorney for Cadence Bank, N.A.; and Timothy Niarhos, Attorney for Manroy USA, LLC.

3. To the best of the United States Trustee's knowledge, Michael E. Collins

has no connections with the debtor, creditors any other parties in

interest, their respective attorneys and accountants, the United States

Trustee and persons employed in the Office of the United States

Trustee other than as set forth in his Verified Statement attached

hereto as Exhibit 1.

4. The United States Trustee requests that this appointment be made

effective as of February 23, 2011.

WHEREFORE, the United States Trustee requests entry of the proposed order

filed simultaneously herewith approving the appointment of February 23, 2011 as

Chapter 11 Trustee in this case and for such other relief as may be necessary and

appropriate.

Respectfully submitted,

DANIEL M. MCDERMOTT

UNITED STATES TRUSTEE, REGION 8

/s/ Beth Roberts Derrick

Beth Roberts Derrick, BPR 7138

Assistant United States Trustee

701 Broadway, Room 318

Nashville, TN 37203

Tel: 615-736-2254

Fax: 615-736-2260

Email: beth.r.derrick@usdoj.gov

CERTIFICATE OF SERVICE

I hereby certify that on the <u>23RD</u> day of February, 2011, a copy of the Appointment of Chapter 11 Trustee was served via email on the debtor's attorneys and all parties which had filed notices of appearance, and a true and exact copy was served via U.S. mail, postage prepaid, to the debtor at the following address:

Sabre Defence Industries, LLC 450 Allied Drive Nashville, TN 37211

/S/ Beth Roberts Derrick (TN BPR #7138)
Beth Roberts Derrick

IN THE UNITED STATES BANKRUPTCY COURT FOR THE MIDDLE DISTRICT OF TENNESSEE NASHVILLE DIVISION

IN RE:)	
SABRE DEFENCE INDUSTRIES LLC,) CASE NO. 3:11-01431) CHAPTER 11	
DEBTOR.)) JUDGE LUNDIN)	

VERIFIED STATEMENT OF MICHAEL E. COLLINS

I, MICHAEL E. COLLINS, state under penalty of perjury:

1. I am, and was at all times relevant to this matter, more than eighteen (18) years of age. I hold Bachelor of Arts degree from the University of Tennessee, a law degree from Samford University, Cumberland School of Law, and a Master of Business Administration degree from Vanderbilt University. I am a former Assistant U.S. Trustee and have overseen the administration of hundreds of chapter 11 cases. I have worked as a Business Recovery Consultant for PricewaterhouseCoopers, L.L.P., analyzing the operations of distressed businesses and providing financial and operational advice. I have practiced bankruptcy law in both the private and public sector for over 10 years. I am presently a partner at Manier & Herod, P.C. and have been with that firm since January 2003. I am admitted to practice law in the state courts of Tennessee and Texas, and in the U.S. Bankruptcy Courts for the Middle and Eastern Districts of Tennessee and Northern and Eastern Districts of Texas. I am a Certified Business Bankruptcy Specialist and a Certified Insolvency and Restructuring Advisor. I have served as Chapter 11 Trustee in numerous bankruptcy cases in the U.S. Bankruptcy Court for the Middle District of Tennessee.

2. Based upon all information received as of this date concerning this case, I have no connections with the debtor in possession, creditors, any other parties in interest, their respective attorneys and accountants, the United States Trustee or persons employed in the Office of the United States Trustee for Region 8 except as follows:

-- I was formerly employed by the Office of the U.S. Trustee in Nashville, Tennessee, as an attorney. I resigned from that employment in June 2000. During my employment in the U.S. Trustee's Office, I oversaw the Chapter 11 case of Ramo Manufacturing Co., which may have previously owned assets that are now assets of the Debtor.

3. For purposes of a lodestar analysis of compensation requested as trustee in this particular case, my initial hourly rate will be \$370. I acknowledge total trustee compensation is subject to the cap set forth in 11 U.S.C. § 326.

4. I agree to provide to the Office of the U.S. Trustee within 10 days of the date of this affidavit all background information necessary for the investigation of me on behalf of the U.S. Department of Justice.

I declare under penalty of perjury, that the foregoing information is true and correct to the best of my knowledge, information and belief.

[REMAINDER OF PAGE INTENTIONALLY BLANK]

Executed in Nashville, Tennessee on this 23rd day of February, 2011.

MICHAEL E. COLLINS (#16036)

Manier & Herod One Nashville Place

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Nashville, TN 37219-2494 mcollins@manierherod.com

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